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Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: New Ulm Telecom, Inc.

Form 499 Filer ID: 807102

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen

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List ABCDE

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555



STATEMENT OF COMPLIANCE

The operating procedures of New Ulm Telecom, Inc. ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: Western Telephone Company.

Form 499 Filer ID: 807753

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555



STATEMENT OF COMPLIANCE

The operating procedures of Western Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982
10900337

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: Peoples Telephone Company.

Form 499 Filer ID: 809556

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555



STATEMENT OF COMPLIANCE

The operating procedures of Peoples Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555

Website: www.nutelecom.net

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: Hutchinson Telephone Company.

Form 499 Filer ID: 802989

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen



STATEMENT OF COMPLIANCE

The operating procedures of Hutchinson Telephone Company ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: Hutchinson Telecommunications Inc.

Form 499 Filer ID: 818874

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen



STATEMENT OF COMPLIANCE

The operating procedures of Hutchinson Telecommunications Inc ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: New Ulm Phonery, Inc.

Form 499 Filer ID: 807103

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555



STATEMENT OF COMPLIANCE

The operating procedures of New Ulm Phonery, Inc. ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: New Ulm Long Distance, Inc.

Form 499 Filer ID: 807101

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed Nancy Blankenhagen

Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
Voice: 507 627-4111
Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
Springfield, MN 56087
Voice: 507 723-4211
Fax: 507 723-4377

Aurelia, IA
NU-Telecom
221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555



STATEMENT OF COMPLIANCE

The operating procedures of New Ulm Long Distance, Inc. ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

Our company does not use CPNI in any of its marketing efforts, and does not permit the use of, or access to, customer CPNI by our affiliates or any third parties. We use, disclose or permit access to CPNI only for the purposes permitted under 47 U.S.C. Sections 222(c)(1) and (d).

CPNI Safeguards

Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.

Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI, and we have an express disciplinary process in place if the rules are violated.

Our company authenticates the identity of a customer prior to disclosing CPNI based on a customer-initiated telephone contact, online account access, or in-store visit.

Our company discloses call detail information (CDI) in a customer-initiated call only: after the customer provides a pre-established password; or, at the customer's request, by sending the CDI to the customer's address of record; or by calling back the customer at his or her telephone number of record.

Our company discloses CPNI to a customer in person at our retail location(s) only when the customer presents a valid photo ID and the ID matches the name on the account.

Our company establishes passwords with customers in order to authenticate customers. Neither passwords nor the backup method for authentication rely on customers' readily available biographical information.

Our company has established password protection for customers' online accounts.

Our company includes terms specifying the confidentiality and use of CPNI in its contracts with business customers that are served by a dedicated account representative.

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221 Main St.
Aurelia, IA 51005
Voice: 712 434-5989
Fax: 712 434-5555

Website: www.nutelecom.net

Our company notifies a customer immediately of changes in: a customer's password, a customer's response to back-up means of authentication, online account, or address of record.

CPNI Recordkeeping and Reporting

Our company is prepared to provide the FCC with written notice, within five business days of any instance where the "opt out" mechanisms do not work properly.

Our company is prepared to notify the U.S. Secret Service and FBI within seven business days after the occurrence of an intentional, unauthorized (or exceeding authorization), access to, use of, or disclosure of CPNI. We may also notify the customer of such breach, after consulting with the investigatory agency(ies), if we believe there is an extraordinarily urgent need to notify a customer (or class of customers) in order to avoid immediate or irreparable harm. We will notify the customer of the breach after 7 business days following notification to the FBI and Secret Service, if such agencies have not requested that we postpone disclosure to the customer.

Our company will maintain records of any discovered breaches, notices to the Secret Service and FBI, and their responses, for at least two years.



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 2, 2009

Name of company(s) covered by this certification: New Ulm Cellular #9, Inc.

Form 499 Filer ID: N/A

Name of signatory: Nancy Blankenhagen

Title of signatory: Chief Financial Officer

I, Nancy Blankenhagen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

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Signed Nancy Blankenhagen

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STATEMENT OF COMPLIANCE

The operating procedures of New Ulm Cellular #9, Inc. ensure compliance with the FCC's CPNI Rules. Such procedures are as follows:

Use of CPNI in Marketing

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CPNI Safeguards

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Corporate Headquarters
New Ulm Telecom, Inc.
27 N. Minnesota St.
New Ulm, MN 56073
Voice: 507 354-4111
Fax: 507 354-1982
10968371

Redwood Falls
NU-Telecom
137 East 2nd St.
Redwood Falls, MN 56283
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Fax: 507 627-4110

Springfield
NU-Telecom
22 South Marshall St.
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